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Attorneys for Plaintiffs  
*Ferdinand D. Ladera, Florian Usseglio*  
*Ivan Laliashvili and Martina Fichera*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
SPOKANE DIVISION**

FERDINAND LADERA,

Plaintiff,

v.

LITB, INC. dba LIGHT IN THE BOX,

Defendant.

CASE NO. 2:22-cv-00221

**CONSOLIDATED FOR PRE-  
TRIAL DISCOVERY**

**JOINT STATUS REPORT**

FLORIAN USSEGLIO,

Plaintiff,

v.

LITB, INC. dba LIGHT IN THE BOX,

Defendant.

CASE NO. 2:22-cv-00223

JOINT STATUS REPORT

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2:22-cv-00221, 2:22-cv-0023, 2:22-cv-0024, 2:22-cv-260

1 IVAN LALIASHVILI,

2 Plaintiff,

3 v.

4 LITB, INC. dba LIGHT IN THE BOX,

5 Defendant.

CASE NO. 2:22-cv-00224

8 MARTINA FICHERA,

9 Plaintiff,

10 v.

11 LITB, INC. dba LIGHT IN THE BOX,

12 Defendant.

CASE NO. 2:22-cv-00260

14  
15 Plaintiffs FERDINAND LADERA, FLORIAN USSEGLIO, IVAN  
16 LALIASHVILI and MARTINA FICHERA, and Defendant LITB, INC. dba  
17 LIGHT IN THE BOX, by and through their undersigned counsel, and pursuant to  
18 the Court's Order Regarding Motion to Consolidate, hereby submit their Joint  
19 Status Report as follows:  
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22 **1. Trial Date**

23 Pursuant to the Court's Order granting the motion to consolidate, the cases  
24 "are consolidated for pretrial discovery and motion practice only" and "the issue of  
25 trial consolidation can be reconsidered later." Thus, the parties propose the  
26 following trial dates in each separate case:  
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<b>Case</b>	<b>Proposed Trial Date</b>
<i>Ferdinand Ladera v. Litb, Inc. dba Light In The Box</i> , Case No. 2:22-cv-00221	<b>06/03/2024</b>
<i>Florian Usseglio v. Litb, Inc. dba Light In The Box</i> , Case No. 2:22-cv-00223	<b>06/17/2024</b>
<i>Ivan Laliashvili v. Litb, Inc. dba Light In The Box</i> , Case No. 2:22-cv-00224	<b>07/01/2024</b>
<i>Martina Fichera v. Litb, Inc. dba Light In The Box</i> , Case No. 2:22-cv-00260	<b>07/15/2024</b>

## **2. Estimated Length of Trial**

Pursuant to the Court's Orders Re: Motion to Consolidate Cases: "The issue of trial consolidation can be reconsidered later." The parties anticipate that trial will require 3-5 trial days per case if tried separately. Defendant expects that if the matters are consolidated for trial, the total trial time would be 7-10 days. Defendant expects to raise the issue of trial consolidation at a later date for the Court to reconsider.

## **3. Deadlines for Consolidated Motion Practice and Discovery**

<b>Action</b>	<b>Joint Proposal of the Parties</b>
Deadline for Motions for Joinder of Additional Parties	<b>04/28/2023</b>
Exchange of Initial Expert Disclosures and Reports	<b>01/12/2024</b>
Exchange of Expert Rebuttal Reports	<b>02/09/2024</b>

Discovery Cut off	<b>02/23/2024</b>
Last Day to File and Serve all Dispositive Motions and <i>Daubert</i> Motions	<b>03/08/2024</b>
Deadline for Motions in Limine	<b>05/03/2024</b>
Deadline for Joint Pretrial Exhibit Stipulation	<b>05/17/2024</b>
Pretrial Conference	<b>05/27/2024</b>
Pretrial Order (Local Rule 16.1(e))	<b>05/20/2024</b>
Deadline for Proposed Jury Instructions, Trial Briefs, and/or Proposed Findings of Fact and Conclusions of Law, and Proposed Voir Dire	<b>05/17/2024</b>
Exchange of Initial Exhibit and Witness Lists	<b>04/19/2024</b>
Deadline for Filing of Deposition Designations	<b>05/17/2024</b>

DATED: April 7, 2023

Respectfully submitted,

/s/ Joel B. Rothman

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